

## **NOTICE OF AMENDMENT**

**May 30, 2000**

### **CERTIFIED - RETURN RECEIPT REQUESTED**

**Mr. Daryl Pierce  
PAPCO  
P.O. Box 627  
Warren, PA 16365**

**CPF No. 1-2000-0002M**

**Dear Mr. Pierce:**

**On March 13-16, 2000, a representative of the Eastern Region, Office of Pipeline Safety OPS, pursuant to Chapter 601 of the United States Code, conducted an onsite pipeline safety inspection of your facility and records in Warren, Pennsylvania.**

**As a result of a review of your Operating and Maintenance Manual (O&M), Emergency Plan, and Drug and Alcohol procedures, the following procedures were either found to be inadequate or missing entirely from the appropriate manuals.**

#### **O&M Procedures:**

- 1. Section 192.605 requires operators to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response. The O&M manual must address the applicable sections outlined under § 192.605 and also sections outlined under Subpart L-Operations, Subpart M-Maintenance, and Subpart I-Corrosion Control of the code. During the review of your procedures the following deficiencies were noted:**
  - (a) Section 192.605 (b)(5), in that your manual does not address start-up and shut-down procedures for your pipeline system.**

- (b) **Section 192.605 (b)(8), in that your manual does not address requiring periodic review of operating personnel to determine the adequacy and effectiveness of the established procedures.**
- (c) **Section 192.605 (b)(9), in that your manual does not address procedures for taking adequate precautions in excavated trenches.**
- (d) **Section 192.613, in that your manual does not contain continuing surveillance procedures for your pipeline system.**
- (e) **Section 192.614, in that the written procedures addressing your damage prevention program, as outlined in your manual, were found to be inadequate in that they did not address the requirements outlined under § 192.614.**
- (f) **Section 192.616, in that your manual does not contain procedures for educating the public with regards to recognizing and reporting a gas pipeline emergency.**
- (g) **Sections 192.619-621, in that your manual does not contain procedures for establishing and maintaining the MAOP on your system.**
- (h) **Section 192.625, in that your manual does not contain procedures for monitoring odorization levels throughout your system to ensure that the gas is readily detectible at concentrations of 1/5 lower explosive limit (LEL). In order to ensure that the gas is detectible at this level, tests must be conducted with a properly calibrated instrument at specified intervals.**
- (i) **Section 192.727, in that the abandonment and deactivation procedures outlined in your manual does not require purging of gas prior to abandonment or deactivation. The code does not require purging of gas in situations where the volume of gas is so small that there is no potential hazard.**
- (j) **Section 192.731, in that your manual does not contain procedures for the inspection and testing of relief devices at compressor stations.**
- (k) **Section 192.735, in that your manual does not contain procedures to address the storage of combustible materials at compressor stations.**

- (l) Section 192.739, in that the pressure limiting and pressure regulating inspection and testing procedures outlined in your manual were found to be inadequate in that they did not provide guidance to operating personnel as to how and when the inspections are to be conducted and what forms are used for documenting the inspections and tests.
- (m) Section 192.743, in that the procedures for the testing of relief devices at pressure limiting and regulating stations, as outlined in your manual, were found to be inadequate in that they did not provide guidance to operating personnel as to how and when the inspections are to be conducted and the forms to be used for documentation.
- (n) Section 192.747, in that the procedures outline in your manual for valve maintenance were found to be inadequate in that they did not provide instructions for inspecting and servicing the valves.
- (o) Section 192.479, .481, in that your manual does not contain procedures for the detection and remediation of atmospheric corrosion on your pipeline facility.
- (p) Section 192.751, in that your manual does not contain procedures for the prevention of accidental ignition.

**Emergency Plan Procedures:**

- 2. Section 192.615(a) of the code requires operators to establish written procedures to minimize the hazard resulting from a gas pipeline emergency. The emergency procedures must address all requirements outlined under § 192.615.
  - (a) Section 192.615(a)(3)(ii), in that your Emergency Plan does not contain procedures to addressing prompt and effective response to a fire located near or directly involving a pipeline facility.
  - (b) Section 192.615(a)(3)(iii), in that your Emergency Plan does not contain procedures addressing prompt and effective response to an explosion occurring near or directly involving a pipeline facility.
  - (c) Section 192.615 (a)(3)(iv), in that your Emergency Plan does not contain procedures addressing prompt and effective response to natural disasters are not listed in the Emergency Plan.

- (d) Section 192.615(a)(4), in that your Emergency Plan does not contain procedures addressing the availability of equipment, tools, and materials as needed at the scene of an emergency.
- (e) Section 192.615(a)(6), in that your Emergency Plan does not contain procedures addressing emergency shutdown and pressure reduction on any portion of your system to minimize hazards to life or property.
- (f) Section 192.615(b)(2), in that your Emergency Plan does not contain procedures outlining the emergency plan training program and the methods used to ensure that the training is effective.
- (g) Section 192.615(b)(3), in that your Emergency Plan does not contain procedures addressing the requirement for reviewing an employees activities following an emergency to ensure that the procedures were adequate and that they were implemented correctly.
- (h) Section 192.615(c), in that your Emergency Plan does not contain procedures for establishing and maintaining liaison with fire, police, and other public officials.
- (i) Section 192.617, in that your Emergency Plan does not contain procedures for conducting failure investigations.

**Drug and Alcohol Plan:**

- 3. Section 199.7, in that Section 199.7 of the code requires that operators maintain and follow a written anti-drug plan that conforms to the requirements outlined under Part 199 and part 40 of the code of Federal regulations.
  - (a) During the review of your Drug and Alcohol Plan, it was noted that the plan did not address all of the requirements under Part 199 of the code. The plan only addressed part 40 requirements.

As provided in 49 C.F.R. 190.237, this Notice of Amendment serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 90 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. 190.237.

**Please reference CPF No. 1-2000-0002M in all correspondence regarding this matter.**

**Sincerely,**

**William H. Gute  
Director, Eastern Region  
Office of Pipeline Safety**

**MYAZEMBOSKI/sj/DPS-24/(724) 898-3705/5/30/00  
FILE: CPF-1-2000-0002M/PAPCO-Notice of Amendment  
e:\wpwin\sj\amendments\cpf120000002M.my.wpd  
cc: DPS-22.1, DPS-24, NJDO, MEDO, PIDO, Regions  
Electronic copy to Catrina Pavlik**